

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE and KEBE  
STUDIOS LLC,

Defendants.

Case No. 1:19-cv-01301-WMR

**DECLARATION OF W. ANDREW PEQUIGNOT**

I, W. Andrew Pequignot, make the following declaration:

1. I represent Plaintiff Belcalis Marlenis Almánzar (“Plaintiff”) in the above-captioned action. I am over the age of 18 and have personal knowledge of the facts stated herein.

2. A true and correct copy of the January 19, 2021 email from Ms. Sherri Lundy to counsel of record for the parties and the response from Ms. Olga Izmaylova is attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 8, 2021

/s/ W. Andrew Pequignot  
W. Andrew Pequignot

# Exhibit A

**From:** Olga Izmaylova [olga@silawatl.com](mailto:olga@silawatl.com)  
**Subject:** Re: 19-cv-01301-WMR Almanzar v. Kebe et al  
**Date:** January 19, 2021 at 1:59 PM  
**To:** Sherri Lundy [Sherri\\_Lundy@gand.uscourts.gov](mailto:Sherri_Lundy@gand.uscourts.gov), [andrew@themoorefirm.com](mailto:andrew@themoorefirm.com), [g@adelmanmatz.com](mailto:g@adelmanmatz.com), [lisa@themoorefirm.com](mailto:lisa@themoorefirm.com), [sarah@adelmanmatz.com](mailto:sarah@adelmanmatz.com), Sadeer Sabbak [ssabbak@silawatl.com](mailto:ssabbak@silawatl.com)



Good Afternoon Ms. Lundy,

Thank you for the update. We will prepare and file Ms. Kebe's response to the Motion for Summary Judgment on Friday, January 22, 2021. We appreciate your help in this matter.

Have a great day,

Olga Izmaylova  
Sabbak & Izmaylova, P.C.  
1875 Old Alabama Road  
Suite 760  
Roswell, GA 30076  
Office (404) 793-7773  
Fax (678) 878-4911  
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[www.AtlantaCriminalDefenseTeam.com](http://www.AtlantaCriminalDefenseTeam.com)

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**From:** Sherri Lundy <[Sherri\\_Lundy@gand.uscourts.gov](mailto:Sherri_Lundy@gand.uscourts.gov)>  
**Sent:** Tuesday, January 19, 2021 1:56:10 PM  
**To:** [andrew@themoorefirm.com](mailto:andrew@themoorefirm.com) <[andrew@themoorefirm.com](mailto:andrew@themoorefirm.com)>; [g@adelmanmatz.com](mailto:g@adelmanmatz.com) <[g@adelmanmatz.com](mailto:g@adelmanmatz.com)>; [lisa@themoorefirm.com](mailto:lisa@themoorefirm.com) <[lisa@themoorefirm.com](mailto:lisa@themoorefirm.com)>; Olga Izmaylova <[olga@silawatl.com](mailto:olga@silawatl.com)>; [sarah@adelmanmatz.com](mailto:sarah@adelmanmatz.com) <[sarah@adelmanmatz.com](mailto:sarah@adelmanmatz.com)>; Sadeer Sabbak <[ssabbak@silawatl.com](mailto:ssabbak@silawatl.com)>  
**Subject:** 19-cv-01301-WMR Almanzar v. Kebe et al

Hello. Judge Ray has reviewed the Motion for Extension of Time to File a Response to the Motion for Summary Judgment [Doc 108] which was not filed until Sunday despite that the Response to the Motion for Summary Judgment is due Wednesday. He has also reviewed the Plaintiff's Response to the Motion which was filed a day later, yesterday, and he notes that the Defendant has not yet had a chance to file a reply to the response. As we sit here today, the Judge does not expect to grant the Motion [Doc 108] and he is giving as much notice as he can of his likely ruling so that you will have time to file your response to the Motion for Summary Judgment. It is not reasonable for Defendant to have filed the motion three days before the response is due, but to the extent the parties would like an additional two days to respond, which is the same amount of time that the motion has been pending before the Judge, he will grant an extension until end of day on Friday, January 22, 2021 in order for the Defendant to file a response to the Motion for Summary Judgment.

**Sherri L Lundy**  
Judicial Assistant to the  
Honorable William M. Ray, II  
(404) 215-1660 Chambers  
(404) 215-1481 Direct Line